USDA

Privacy Impact Assessment (PIA)
Commodity Operation Systems (COS)

Revision: *Final*

FSA
FARM SERVICE AGENCY

Farm Service Agency

Date: *August 12, 2009*

Document Information

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Document Revision and History			
Revision	Date	Author	Comments
1.01	July 6, 2009	Scott Tanos, ISO	*Initial version*
1.02	July 8, 2009	Scott Tanos, ISO	Populated sections 3, 4, and 5 from previous PIA
1.02	July 27, 2009	CSO	Reviewed and Updated
1.03	July 27, 2009	D.Brizendine	Updated responses for 24, 25,26, 26.1; document review
Final	8/12/09	D.Brizendine	Marked final, merged completed Sign off page

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1 Purpose of Document

USDA DM 3515-002 states: "Agencies are responsible for initiating the PIA in the early stages of the development of a system and to ensure that the PIA is completed as part of the required System Life Cycle (SLC) reviews. Systems include data from applications housed on mainframes, personal computers, and applications developed for the Web and agency databases. Privacy must be considered when requirements are being analyzed and decisions are being made about data usage and system design. This applies to all of the development methodologies and system life cycles used in USDA.

Both the system owners and system developers must work together to complete the PIA. System owners must address what data are used, how the data are used, and who will use the data. System owners also need to address the privacy implications that result from the use of new technologies (e.g., caller identification). The system developers must address whether the implementation of the owner's requirements presents any threats to privacy."

The Privacy Impact Assessment (PIA) document contains information on how the **Commodity Operations Systems (COS)** affects the privacy of its users and the information stored within. This assessment is in accordance with NIST SP 800-37 *Guide for the Security Certification and Accreditation of Federal Information Systems.*

2 System Information

System Information	
Agency:	Farm Service Agency
System Name:	Commodity Operation Systems
System Type:	☒ Major Application ☐ General Support System ☐ Non-major Application
System Categorization (per FIPS 199):	☐ High ☒ Moderate ☐ Low
Description of System:	The Commodity Operations System (COS) was developed to automate the entry of Commodity Requests, Export and LTC Invitations, Commodity Bids, Freight Bids, and the Evaluation process. These functions support the USDA's procurement of commodities exported under Foreign Food Aid for Humanitarian Assistance Programs. COS provides Internet access to KCCO, US-AID, FAS, Private Voluntary Organizations, Freight Forwarders, Port Authorities, and Vendors and Steamship Lines.
Who owns this system? (Name, agency, contact information)	Khristy Baughman (816)926-1200 Khristy.Baughman@kcc.usda.gov
Who is the security contact for this system? (Name, agency, contact information)	Brian Davies Information System Security Program Manager (ISSPM) U.S. Department of Agriculture Farm Service Agency 1400 Independence Avenue SW Washington, D.C. 20250 (202) 720-2419 Brian.Davies@wdc.usda.gov
Who completed this document? (Name, agency, contact information)	Kathy Winburn (816) 926-1924 kathy.winburn@kcc.usda.gov

3 Data Information

3.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	Customer – Sponsor (Private Voluntary Organization), commodity vendor and Freight Forwarder information is used in COS. For these entity types, company name, address, and PCIMS entity number (if applicable) are maintained. Entities are identified by system-generated entity IDs. People can be related to these entities. A person's name, address, phone and e-mail information are maintained in COS. People are identified by system generated personal IDs. System generated logon IDs are assigned to each person with access to the system. Employee – USDA, AID, and FAS user information are maintained in COS. Each employee with access to the system is assigned a personal ID and login ID. Name, address, phone and email information are entered into COS. Other – Commodity request and bid information is used in COS.
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	☐ Yes ☒ No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	
3	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President.	☒ Yes ☐ No

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No.	Question	Response
4	Sources of the data in the system.	The USDA enters entity and personal information into COS. Each Sponsor or AID may have people that are given authority to maintain people and logon ID information for their organization. Sponsors, the USDA, or AID enter commodity request information into the system. The USDA creates invitations. Commodity vendors enter commodity bid information into the system. The LTCS subsystem retrieves delivery orders, commodity information and vendor data from PCIMS as needed
4.1	What data is being collected from the customer?	Sponsor (Private Voluntary Organization), commodity vendor and Freight Forwarder information is used in COS. For these entity types, company name, address, and PCIMS entity number (if applicable) are maintained. Entities are identified by system-generated entity IDs. People can be related to these entities. A person's name, address, phone and e-mail information are maintained in COS. People are identified by system generated personal IDs. System generated logon IDs are assigned to each person with access to the system.
4.2	What USDA agencies are providing data for use in the system?	AID and the USDA maintain data in COS
4.3	What state and local agencies are providing data for use in the system?	None
4.4	From what other third party sources is data being collected?	None
5	Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources.	☒ Yes ☐ No – If NO, go to question 6.
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	Data validation routines are in place when data is accepted into the system.
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Data validation routines are in place when data is accepted into the system.

No.	Question	Response
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Data validation routines are in place when data is accepted into the system.

3.2 Data Use

No.	Question	Response
6	Individuals must be informed in writing of the principal purpose of the information being collected from them. What is the principal purpose of the data being collected?	WFO enters commodity request information into FARES. AID maintains and approves commodity request data in FARES. Procuring commodities for domestic and international programs
7	Will the data be used for any other purpose?	☐ Yes ☒ No – If NO, go to question 8.
7.1	What are the other purposes?	
8	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President	☒ Yes ☐ No
9	Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected (i.e., aggregating farm loans by zip codes in which only one farm exists.)?	☐ Yes ☒ No – If NO, go to question 10.
9.1	Will the new data be placed in the individual's record (customer or employee)?	☐ Yes ☐ No
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	☐ Yes ☐ No
9.3	How will the new data be verified for relevance and accuracy?	
10	Individuals must be informed in writing of the routine uses of the information being collected from them. What are the intended routine uses of the data being collected?	Procuring commodities for domestic and international programs

No.	Question	Response
11	Will the data be used for any other uses (routine or otherwise)?	☐ Yes ☒ No – If NO, go to question 12.
11.1	What are the other uses?	
12	Automation of systems can lead to the consolidation of data – bringing data from multiple sources into one central location/system – and consolidation of administrative controls. When administrative controls are consolidated, they should be evaluated so that all necessary privacy controls remain in place to the degree necessary to continue to control access to and use of the data. Is data being consolidated?	☒ Yes ☐ No – If NO, go to question 13.
12.1	What controls are in place to protect the data and prevent unauthorized access?	Access is controlled by role based security restrictions defined in SAS.
13	Are processes being consolidated?	☒ Yes ☐ No – If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	Access is controlled by role based security restrictions defined in SAS.

3.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	☐ Yes ☒ No – If NO, go to question 15.
14.1	How long is the data retained whether it is on paper, electronic, in the system or in a backup?	
14.2	What are the procedures for purging the data at the end of the retention period?	
14.3	Where are these procedures documented?	
15	While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	The personal ID and date/time of the last modification to a table in COS are stored on the database. Portions of the commodity request cannot be modified once the request moves into History. Bid information is validated prior to submission Data access and modifications are controlled by status code and role based security restrictions defined in SAS.

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No.	Question	Response
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	☒ Yes ☐ No

3.4 Data Sharing

No.	Question	Response
17	Will other agencies share data or have access to data in this system (i.e., international, federal, state, local, other, etc.)?	☒ Yes ☐ No – If NO, go to question 18.
17.1	How will the data be used by the other agency?	WFO enters commodity request information into FARES. AID maintains and approves commodity request data in FARES
17.2	Who is responsible for assuring the other agency properly uses the data?	System owners and all of the users of the system
18	Is the data transmitted to another agency or an independent site?	☐ Yes ☒ No – If NO, go to question 19.
18.1	Is there appropriate agreement in place to document the interconnection and ensure the PII and/or Privacy Act data is appropriately protected?	
19	Is the system operated in more than one site?	☐ Yes ☒ No – If NO, go to question 20.
19.1	How will consistent use of the system and data be maintained in all sites?	

3.5 Data Access

No.	Question	Response
20	Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)?	Customers with logon privileges to COS have access to the data according to their security privileges as defined in the Security Administration System (SAS). SAS is used to maintain system roles and role access within COS and its subsystems BPES, IPS, EBES, FEBES, FARES, CTS, LTCS USDA, LTCS Vendor, PES, PVS, and SAS. A system role determines how the data in the system is accessed. The USDA defines numerous system roles

No.	Question	Response
21	How will user access to the data be determined?	For each subsystem, a user is assigned a role in SAS. The user's role determines the pages and the data that can be accessed. The procedures for maintaining system roles, role accesses, and logon IDs are explained in the SAS on-line Help
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	☒ Yes ☐ No
22	How will user access to the data be restricted?	For each subsystem, a user is assigned a role in SAS. The user's role determines the pages and the data that can be accessed. The procedures for maintaining system roles, role accesses, and logon IDs are explained in the SAS on-line Help
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	☒ Yes ☐ No
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	☒ Yes ☐ No

3.6 Customer Protection

No.	Question	Response
24	Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface (i.e., office, person, departmental position, etc.)?	USDA Privacy Office
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	By contacting John Underwood, Privacy Officer, at john.underwood@kcc.usda.gov & 816.926.6992
26	A "breach" refers to a situation where data and/or information assets are unduly exposed. Is a breach notification policy in place for this system?	☒ Yes – If YES, go to question 27. Common FSA incident reporting process. ☐ No
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	

No.	Question	Response

27	Consider the following:
	
	    Consolidation and linkage of files and systems
	
	    Derivation of data
	
	    Accelerated information processing and decision making
	
	    Use of new technologies
	
	Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?
		☐ Yes
		☒ No – If NO, go to question 28.

27.1	Explain how this will be mitigated?	
28	How will the system and its use ensure equitable treatment of customers?	In accordance with law, rules and regulations
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	☐ Yes ☒ No – If NO, go to question 30
29.1	Explain	

4 System of Record

No.	Question	Response
30	Can the data be retrieved by a personal identifier? In other words, does the system actually retrieve data by the name of an individual or by some other unique number, symbol, or identifying attribute of the individual?	☒ Yes ☐ No – If NO, go to question 31
30.1	How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)?	Data is accessed by entity ID. Individuals are assigned a system generated personal ID that is related to an entity ID and that is granted access to data according its role as defined in SAS. An individual associated with a particular entity can be identified by name
30.2	Under which Systems of Record (SOR) notice does the system operate? Provide number, name and publication date. (SORs can be viewed at www.access.GPO.gov.)	USDA/FSA-3

No.	Question	Response
30.3	If the system is being modified, will the SOR require amendment or revision?	☐ Yes ☒ No

5 Technology

No.	Question	Response
31	Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)?	☐ Yes ☒ No – If NO, the questionnaire is complete.
31.1	How does the use of this technology affect customer privacy?	

6 Completion Instructions

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

1. Yes.

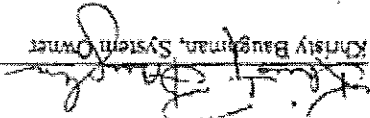PLEASE SUBMIT A COPY TO THE OFFICE OF THE ASSOCIATE CHIEF INFORMATION OFFICE FOR CYBER SECURITY.

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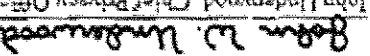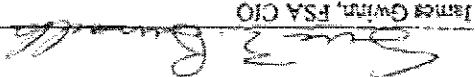
Privacy Impact Assessment Authorization
Memorandum

I have carefully assessed the Privacy Impact Assessment for the

Commodity Operation Systems (COS)

This document has been completed in accordance with the requirements of the E-Government
Act of 2002.

We fully accept the changes as needed improvements and authorize initiation of work to
proceed. Based on our authority and judgment, the continued operation of this system is
authorized.

Khrisiy Baughman, System Owner	Date 7/31/09
John Underwood, Chief Privacy Officer	Date 7/30/09
James Gwinn, FSA CIO	Date 8/12/09